## Exhibit E

**Estimated Staffing and Budget Plan** 

## STAFFING PLAN FOR SULLIVAN & CROMWELL LLP, COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION, FOR THE PERIOD AUGUST 1, 2023 THROUGH OCTOBER 31, 2023

TIMEKEEPER CATEGORY	NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE APPLICATION PERIOD (1)	RANGE OF RATES
Partners	55	\$1,595.00-\$2,165.00
Associates	125	\$775.00-\$1,475.00
Non-Legal Personnel	95	\$425.00-\$595.00

- (1) Estimate is for total number of timekeepers billing any substantial number of hours to matter (not F.T.E.s).
- (2) Includes clerks, legal analysts and eDiscovery professionals.

## ESTIMATED BUDGET FOR SULLIVAN & CROMWELL, COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION, FOR THE PERIOD AUGUST 1, 2023 THROUGH OCTOBER 31, 2023

PROJECT CATEGORY	ESTIMATED HOURS <sup>1</sup>	ESTIMATED FEES <sup>2</sup>	HOURS BILLED	FEES SOUGHT
ASSET ANALYSIS AND				
RECOVERY	2,250.00	\$2,598,750.00	1,368.20	\$1,875,987.50
ASSET DISPOSITION	3,600.00	\$4,158,000.00	2,374.40	\$3,202,935.50
ASSUMPTION AND				
REJECTION OF LEASES				
AND CONTRACTS	300.00	\$346,500.00	40.50	\$36,844.00
AVOIDANCE ACTION				
ANALYSIS	5,400.00	\$6,237,000.00	5,948.40	\$7,750,840.50
BUSINESS OPERATIONS	1,050.00	\$1,212,750.00	568.90	\$814,000.00
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CASE ADMINISTRATION	525.00	\$606,375.00	134.10	\$255,661.50
CLAIMS ADMINISTRATION				
AND OBJECTIONS	1,200.00	\$1,386,000.00	431.40	\$609,383.00
CORPORATE				
GOVERNANCE AND				
BOARD MATTERS	900.00	\$1,039,500.00	185.90	\$288,828.00
EMPLOYEE BENEFITS AND				
PENSIONS	225.00	\$259,875.00	58.40	\$74,338.00

Estimated hours represent high-end of S&C's estimates of hours during the interim fee period.

<sup>&</sup>lt;sup>2</sup> Estimated fees represent high-end of S&C's estimates of fees during the interim fee period.

PROJECT CATEGORY	ESTIMATED HOURS <sup>1</sup>	ESTIMATED FEES <sup>2</sup>	HOURS BILLED	FEES SOUGHT
EMPLOYMENT AND FEE				
APPLICATIONS (S&C)	750.00	\$866,250.00	215.50	\$258,493.50
EMPLOYMENT AND FEE				
APPLICATIONS (OTHERS)	300.00	\$346,500.00	185.00	\$227,856.50
FINANCING AND CASH	45.00	<b></b>		
COLLATERAL	45.00	\$51,975.00	-	\$0.00
OTHER LITIGATION	1,800.00	\$2,079,000.00	1,408.80	\$1,991,800.00
MEETINGS AND				
COMMUNICATIONS WITH	450.00	Ø510.750.00	211.00	\$201.010.50
CREDITORS	450.00	\$519,750.00	211.90	\$391,010.50
NON-WORKING TRAVEL	150.00	\$173,250.00	24.90	\$22,983.20
PLAN AND DISCLOSURE STATEMENT	1,800.00	\$2,079,000.00	1,201.50	\$1,551,707.50
RELIEF FROM STAY AND	1,800.00	\$2,079,000.00	1,201.30	\$1,551,707.50
ADEQUATE PROTECTION	120.00	\$138,600.00	145.20	\$205,205.50
TAX	1,800.00	\$2,079,000.00	521.90	\$865,158.50
VALUATION	0.00	-	2.60	\$1,430.00
DISCOVERY	15,000.00	\$17,325,000.00	4,278.30	\$3,540,550.00
HEARINGS	150.00	\$173,250.00	35.30	\$69,666.50
FIRST AND SECOND DAY		<del>+ 1 / 2 / 2 / 2 / 2 / 2 / 2 / 2 / 2 / 2 /</del>		400,0000
MOTIONS	60.00	\$69,300.00	-	\$0.00
CLAIMS INVESTIGATION	150.00	\$173,250.00	-	\$0.00
GENERAL INVESTIGATION	1,650.00	\$1,905,750.00	878.20	\$1,242,397.50
SCHEDULES, SOFAS AND	00.00	#10 <b>2</b> 0 <b>5</b> 0 00	21.50	Φ.(0.127.50
REPORTING	90.00	\$103,950.00	31.50	\$60,137.50
OTHER MOTIONS/APPLICATIONS	900.00	\$1,039,500.00	994.60	\$1,221,057.00
TIME ENTRY REVIEW	2,100.00	-	957.40	\$0.00
BUDGETING	30.00	\$34,650.00	-	\$0.00
GENERAL REGULATORY	1,500.00	\$1,732,500.00	124.00	\$200,388.00
BAHAMAS MATTERS	1,950.00	\$2,252,250.00	487.00	\$775,949.50
FOREIGN DEBTOR				
MATTERS	1,950.00	\$2,252,250.00	651.50	\$1,044,778.50
COORDINATION WITH FOREIGN PROCEDURES	300.00	\$346,500.00	21.40	\$43,941.00
COORDINATION IN				,
OTHER BANKRUPTCIES	2,250.00	\$2,598,750.00	373.80	\$500,987.50
INVESTIGATIVE REPORTS	2,250.00	\$2,598,750.00	1,106.10	\$1,354,123.00
CYBER ISSUES	2,014.80	\$3,074,605.20	839.50	\$1,281,085.50
Total	55,009.80	\$61,858,330.20	25,806.10	\$31,759,524.70